R-E-M-A-R-K-S

Claims 1-9, 11-19 and 21-22 remain unchanged from the last amendment.

Claims 1-9, 11-19 and 21-22 are rejected under 35 U.S.C. 103(a) as being unpatentable over Bhatia (6023724) in view of Allard. (5739689).

The Applicant disagrees with this rejection for the reasons stated below.

The Applicant agrees, however, with the Office Action (OA) statement that "*Bhatia does not explicitly indicate [1] a list of domain names looked up on an external DNS [with] corresponding attribute data and [2] that the DNS relay module uses said list and attribute data without connecting to said external DNS when resolving said domain name.*"

The OA then states that the features not found in Bhatia are in Allard and that it is obvious to a person skilled in the art to combine the teachings of Allard with the system of Bhatia. The Applicant disagrees.

The Applicant will argue that Allard does not disclose the feature missing from Bhatia and that further differences exist between the claimed invention and Bhatia.

At the top of page 3, the OA states that Bhatia discloses that the "*DNS relay module uses said list and said attribute data to respond to requests [...] for a numeric address in response to a domain name when said domain name requested is on said list (Column 6, lines 15-18)*". This statement cannot be correct since, according to the previously cited passage of the OA, the list of domain names looked up on an external DNS is **not** disclosed in Bhatia. How can Bhatia return a numeric address in response to a domain name on a list when there are no domain names on the list?

In fact, the passage of Bhatia cited by the OA is quite clear on this. At col. 6, lines 15-16, Bhatia states "*Use of **internal** DNS server provides **local** name-to-address resolution*". Bhatia teaches away from the claimed invention. It does not and cannot return a domain name from a list of domain names looked-up on an **external** DNS.

Of course, the same can be said about the next passage in the OA, which reads "*and said DNS relay module generates a DNS request and transmits said DNS request to an external DNS on said remote network via said local connection to said router, and said DNS relay module returning a reply from said external DNS to said LAN via said local connection to said router to respond to said request for a numeric address when said domain name requested is not on said list.*" Bhatia cannot conclude that a domain name is not on the list of domain names looked-up on an external DNS since, as stated in the OA, it does not have a list of domain names looked up on an external DNS.

Now, regarding Allard, the Applicant believes that it deals with a completely different problems than the one addressed by the present invention. Allard deals with node naming issues in the context where different naming protocols are used in the **same** network of sub-networks (LANs). It does not deals with problems of a LAN connecting with a **remote** network as in the present invention. It does not deals with the incorporation of DNS functionality into a network modem device either.

Allard discloses that there is a set of criteria that must be met to return an address to the LAN node. In some cases, when the domain name is in Cache 54, it will **not** return the address to the LAN node (see Figure 3, when the response type is negative, the network address is unknown). So even though the node name is local, it is possible that is will not return an address. This situation does not occur in the claimed invention. Cache 54 is simply not for the same purpose as it is in the present invention.

Furthermore, when proxy 14 determines that a node name (which is not the same as a DNS) cannot be found in Cache 54, it transmits a p-node query (which is not a DNS request) to the Name Server 32 (which is not an external DNS on a remote network). The Name Server 32 then responds and the information is stored in Cache 54. **No response is sent** to the node requesting the address. This is explicit in Allard's Column 8, lines 9-14. This is therefore contrary to the limitation of claim 1 which states "*said DNS relay module*

generates a DNS request and transmits said DNS request to an external DNS on said remote network via said local connection to said router, and said DNS relay module ***returning a reply from said external DNS to said LAN*** *via said local connection to said router to respond to said request for a numeric address when said domain name requested is not on said list.*"

Finally, the OA states, on page 3, that Allard discloses that a "*network devices includes a DNX* (sic) *Proxy name cache that maintains a list of domain names looked up on an external DNS [with] corresponding attribute data (Column 15, lines 64-66)*". The cited passage of Allard (Column 15, lines 64-66) reads as follows "*protocol B query response). Sending a first query to either the protocol A or protocol B name server, and if the first query does not result in a positive response, then submitting*". There must be an error with the reference to the cited passage since nothing in this passage of Allard relates to a DNS Proxy name cache that maintains a list of domain names. Clarification is respectfully requested.

In view of the arguments submitted above, the Applicant believes that independent claims 1 and 13 are not obvious and are patentable over the cited prior art. The Applicant further believes that the dependent claims are patentable as they are dependent from claims which are otherwise patentable.

In view of the foregoing, it is believed that claims 1-9, 11-19 and 21-22 are allowable over the prior art and a Notice of Allowance to this effect is earnestly solicited.

Respectfully submitted,
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Application Number 09/830,477
Amendment dated December 23, 2005
Reply to Office action of June 28, 2005

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